

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RECEIVED

UNITED STATES OF AMERICA

V.

JENNIE MASSEY

2007 JAN 31 P 2:48

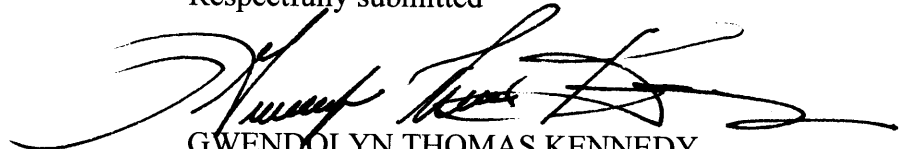
DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT

CASE NO. 2:06CR287-MHT

**DEFENDANT'S QUESTIONS FOR THE JURY ON VOIR DIRE**

Comes now the Defendant, Jennie Massey, by and through her attorneys, Gwendolyn Thomas Kennedy and Glenn D. Zimmerman, and respectfully requests that the following Questions be asked of the potential jurors on Voir Dire.

Respectfully submitted



GWENDOLYN THOMAS KENNEDY

GLENN D. ZIMMERMAN

Attorneys for the Defendant Jennie Massey

3379 Watchman Drive

Montgomery, Alabama 36116

Telephone (334) 273-1261

Fax (334) 273-1262

**Defendant's Questions to the Jury on Voir Dire**

1. Are you personally acquainted with any of the following persons: the prosecutor, the defendant, the defendant's counsel? Do you have any knowledge of them either directly or indirectly, through your social, business, or professional lives?

2. Have either of you panel members ever heard of or been involved with the following entities: United States Attorney's Office, United States Department of Agriculture (USDA), Kennedy Grocery or any grocery or retail outlet which sold groceries, either as an employee, owner or in any other capacity?

3. Are any of the following names familiar to either of you? Darryl Kennedy, Gwendolyn Kennedy, Gwendolyn Smith, Jennie Massey.

4. The Defendant is charged with the following offense:

That on or about the 21st day of March, 2002, in Montgomery, Alabama, within the Middle District of Alabama, Defendant, herein, did knowingly and unlawfully present and cause to be presented for payment and redemption, United States Department of Agriculture Electronic Benefit Transfer Food Coupons, commonly referred to as "food stamps", of a value of approximately \$1,135.00, knowing the same to have been received, transferred and used in a manner not authorized by the Food Stamp Act, as amended (Title 7, United States Code, Section 2011, et seq.), and the regulation issued pursuant to said Act, in violation of Title 7, United States Code, Section 2024 (c).

5. Does either of you have any prior knowledge of the following charge in the Indictment against the Defendant? This includes knowledge gained from personal contacts or from the media. Follow-up, if applicable:

- i. From what source did you hear about this case?
- ii. How many times did you hear or read about it
- iii. Do you remember specifically what you heard or read?
- iv. Did what you heard or what you have read cause you to have any feelings concerning the merits of either the Government's case or the Defendant's position?
- v. Do you have any impression or even tentative opinion about this matter whatsoever?

6. If any of you has served in a Federal Court case, either Criminal or Civil, would that prior experience have any effect upon or influence your ability to serve as a fair and impartial juror in this case?

7. Does either of you have any feeling, thought, inclination, premonition, prejudice, religious belief or persuasion or bias which might influence or interfere with your full and impartial consideration and which might influence you either in favor of or against either the Defendant or the Government?

8. Is there any reason in your mind why you cannot hear and consider the evidence and render a fair and impartial verdict?

9. Can you take the law as the Court instructs you, without any reservation whatsoever, and apply the facts to the Court's instructions on the law? If you cannot do this, please hold up your hand..

10. Do you recognize and accept the proposition that the jurors are the sole judge of the facts and the Court is the sole judge of the law? If you cannot do this, please hold up your hand.

11. If you are selected as a juror in this case can you extend the presumption of innocence to this Defendant, that is, can you presume that the Defendant is innocent of the charge unless and until guilt is established by proof which convinces you beyond a reasonable doubt? If you cannot do this, please hold up your hand.

12. Are you, or is any member of your immediate family a member of a law enforcement agency, ie municipal police, county sheriff, state highway patrol or any federal law enforcement agency, either at the present time or in the past?

13. Does any panel member feel bias or prejudice because the Defendant has been charged by indictment (information) with an offense against the United States.

14. Has any panel member formed or expressed an opinion as to the guilt or innocence of the Defendant?

Does any panel member have:

a.. Any transportation problem ? For example, does anyone have difficulty getting to or from the courthouse?

b. Any medical or disability problems , such as hearing, walking or seeing? Does any other medical problem exist which could affect your service on the jury?

15. The Court and Counsel estimated that this trial will last at least in excess of one day. Does any panel member have any immediate family or personal reason or situation which persuades you that you can not serve as a juror during this period and give your undivided attention to this case?

16. Finally, can any of you think of any matter that you should call to the Court's attention that may have some bearing on your qualifications as a juror or that even to the slightest degree may prevent your rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**JENNIE MASSEY**

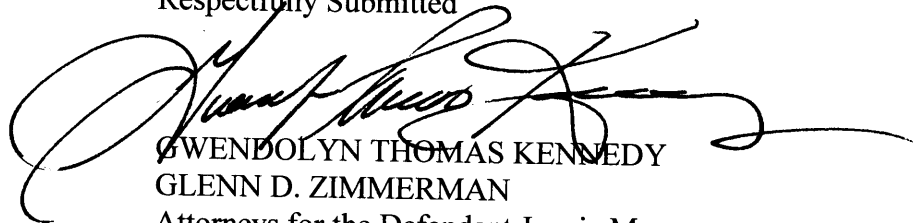
)  
)  
)  
)  
)  
)  
)

**CASE NO. 2:06CR287-MHT**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2007, I filed with the clerk of the Court the foregoing document, and copies to the Assistant United States Attorney, Hon. Kent Brunson, by U.S. Mail, postage pre paid and properly addressed.

Respectfully Submitted



GWENDOLYN THOMAS KENNEDY  
GLENN D. ZIMMERMAN  
Attorneys for the Defendant Jennie Massey

GWENDOLYN THOMAS KENNEDY  
GLENN D. ZIMMERMAN  
Attorney for the Defendant Massey  
3379 Watchman Drive  
Montgomery, Alabama 36116  
Telephone (334) 273-1261  
Fax (334) 273-1262  
[gdzatty@yahoo.com](mailto:gdzatty@yahoo.com)